

Exhibit A
Defendants' Proposed Pre-Trial Schedule

1. **Monday, October 23rd**
 - Plaintiffs to serve Requests for Production and Interrogatories on Defendants, incorporating the “voluntary” requests previously identified.
 - Plaintiffs identify available options for facility site visit locations (i.e., options for two visits – one to a “compliant” and the other to a “non-compliant” facility – that are geographically proximate).
2. **Tuesday, October 24th** – Plaintiffs file Partial Motion for Summary Judgment.
3. **October 25th** – Plaintiffs respond to remaining discovery requests (RFPs and Interrogatories); includes document production, not only service of objections and responses.
4. **Friday, November 3rd** – Defendants file opposition to Partial Motion for Summary Judgment.
5. **Monday, November 6th**
 - Hearing on Plaintiffs' Motion for Partial Summary Judgment (or another date convenient to the Court).
6. **Weeks of October 30th and/or November 6th**
 - Defendants' expert visits Plaintiff facility(ies), subject to appropriate details consistent with the company policy for anyone entering and biosecurity protections, etc. Plaintiffs reserve all rights to assert necessary objections until such information is provided.
 - Defendants conduct depositions of Plaintiffs' fact witnesses/Rule 30(b)(6) witnesses.
7. **Friday, November 10th**
 - Defendants to respond to Plaintiffs' discovery requests, including the remaining document production, not only service of objections and responses.
 - Expert reports/declarations exchanged.
8. **Week of November 13th** – Defendants conduct depositions of Plaintiffs' expert witnesses.
9. **Friday, November 17th** –
 - 9:00 AM ET: Parties to meet and confer concerning whether any or all of the trial may be conducted through a Case Stated procedure in accordance with Judge Young's comments at the pretrial conference. If *Daubert* motions *in limine* are to be filed by any party, such party shall meet and confer on these issues at this time as well.
 - 6:00 PM ET: Any motion(s) resulting from the parties' conference concerning a Case Stated procedure to be filed.
10. **Monday, November 20th** – Any exhibits not already exchanged between the Parties shall be exchanged. Supplemented Exhibit Lists filed with the Court. Parties identify any witnesses whose testimony they may offer during trial, whether by affidavit, deposition, or oral testimony. *Daubert* motions *in limine* filed by this date, if any.
11. **Monday, November 27th** – Pre-trial briefs and all remaining motions *in limine*, if any, filed. Oppositions to *Daubert* motions *in limine* shall be filed. Written objections to proposed exhibits provided.
12. **Wednesday, November 29th** – Oppositions to remaining motions *in limine*, if any, filed.

13. **Thursday, November 30th** - Parties advise the judicial officer and all other parties of their intent to use the testimony of a witness on a specified day.
14. **Monday, December 4th** – Trial begins.